

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	CHAPTER 13
ALAN DWAYNE FRITZ,	:	
Debtor	:	
	:	
JACK N. ZAHAROPOULOS,	:	
STANDING CHAPTER 13 TRUSTEE,	:	
Movant	:	
	:	
ALAN DWAYNE FRITZ,	:	CASE NO. 1-24-bk-02554-HWV
Respondent	:	

TRUSTEE'S OBJECTION TO SECOND AMENDED CHAPTER 13 PLAN

AND NOW, this 19<sup>th</sup> day of May 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney Douglas R. Roeder, Esquire, and objects to the confirmation of the above-referenced Debtor's Plan for the following reasons:

1. Trustee avers that Debtor's Plan is not feasible based upon the following:
  - a. The Plan is underfunded relative to claims to be paid.
  - b. The Plan proposes an unrealistic and speculative step payment, contrary to § 1325(a)(6). Debtor is not employed; thus, the payments are speculative.
  - c. The Plan is inconsistent with Proofs of Claim filed and/or approved by the Court. There are no Proofs of Claim for Best Egg, York County Clerk of Courts, and York Adams Tax Bureau.
2. Trustee avers that Debtor's Plan cannot be administered due to the lack of the following:
  - a. Debtor has not provided Trustee paystubs for Debtor's new job once Debtor is employed.

WHEREFORE, Trustee alleges and avers that Debtor's Plan cannot be confirmed, and therefore, Trustee prays that this Honorable Court will:

- a. deny confirmation of Debtor's Plan;
- b. dismiss or convert Debtor's case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/ Douglas R. Roeder, Esquire  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 19<sup>th</sup> day of May 2025, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

Gary J. Imblum, Esquire  
Imblum Law Offices, P.C.  
4615 Derry Street  
Harrisburg, PA 17111

/s/ Derek M. Stroupbauer, Paralegal  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee